

# CARRILLO & CARRILLO

LAW FIRM-ABOGADOS

Charlie Ezra Carrillo (NY)

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May 2, 2022

**VIA ECF**

The Honorable Paul G. Gardephe  
Thurgood Marshall  
United States Courthouse 40 Foley  
Square  
New York, NY 10007

Re: ***Choto Pleitez, et al. v. The Republic of El Salvador, et al.***  
21-cv-01424 (PGG)  
Status Update and Motion to Continue

Dear Judge Gardephe:

The undersigned counsel writes on behalf of the Plaintiffs and requests that the Status Conference on May 5, 2022, be continued.

On March 22, 2022, we received from the Clerk of the Court the completed mandatory forms for service under the *Additional Protocol to the Inter-American Convention on Letters Rogatory*. On April 19, 2022, we received the apostilled Summons and Complaints, and we sent them along with official translations and copies to the company that handles service under the *Additional Protocol*, ABC Legal. We are awaiting their confirmation on the outcome of their attempts to serve the defendants.

For the Salvadoran political subdivision and government agency Defendants, if we are unsuccessful serving those defendants under the *Additional Protocol*, we will attempt service under 28 U.S.C. § 1608(a)(4) or (b)(3)(B). For the Defendants to be served according to FRCP Rule 4(f)(1), if service is not successful under the *Additional Protocol*, the undersigned counsel will have to request alternative means of service from this Court.

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For the above stated reasons, Plaintiffs' counsel respectfully requests Your Honor grant this motion and order a continuance for the Status Conference.

Respectfully submitted,

*Charlie Carrillo*

**Memo Endorsed:** The initial pre-trial conference scheduled for May 5, 2022 is adjourned to **June 2, 2022 at 11:15 a.m.** in Courtroom 705 of the Thurgood Marshall U.S. Courthouse, New York, New York.

Charlie Carrillo, Esquire  
Counsel for the Plaintiffs

SO ORDERED.

*Paul G. Gardephe*  
Paul G. Gardephe  
United States District Judge

Dated: May 4, 2022

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